

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re BP p.l.c. Securities Litigation

No. 4:10-md-02185

This document relates to:

Alameda County Employees' Retirement Association, et al. v. BP p.l.c. et al.

No. 4:12-cv-01256 (cons.)

Avalon Holdings Inc., et al. v. BP p.l.c. et al.

No. 4:12-cv-03715

Stichting Pensionenfonds Metaal en Techniek, et al. v. BP p.l.c. et al.

No. 4:13-cv-00069

HESTA Super Fund v. BP p.l.c. et al.

No. 4:13-cv-00129

Verizon Investment Management Corp. v. BP p.l.c. et al.

No. 4:13-cv-01044

New York City Employees' Retirement System et al. v. BP p.l.c. et al.

No. 4:13-cv-01393

Arkansas Teacher Retirement System, et al. v. BP p.l.c., et al.

No. 4:14-cv-00457

Washington State Investment Board v. BP p.l.c., et al.

No. 4:14-cv-00980

Helaba Invest Kapitalanlagegesellschaft mbH, et al. v. BP p.l.c., et al.

No. 4:14-cv-01065

Maryland State Retirement and Pension System v. BP p.l.c., et al.

No. 4:14-cv-01068

GIC Private Limited v. BP p.l.c., et al.

No. 4:14-cv-01072

Pension Reserves Investment Management Board of Massachusetts v. BP p.l.c., et al.

No. 4:14-cv-01084

Virginia Retirement System, et al. v. BP p.l.c., et al.

No. 4:14-cv-01085

Louisiana State Employees' Retirement System, et al. v. BP p.l.c., et al.

No. 4:14-cv-01087

*IBM United Kingdom Pensions Trust Limited,
et al. v. BP p.l.c., et al.*

No. 4:14-cv-01279

*Universities Superannuation Scheme Ltd. acting
as sole corporate trustee of Universities
Superannuation Scheme v. BP p.l.c., et al.*

No. 4:14-cv-01280

Merseyside Pension Fund v. BP p.l.c., et al.

No. 4:14-cv-01281

*The Bank of America Pension Plan v. BP p.l.c., et
al.*

No. 4:14-cv-01418

Honorable Keith P. Ellison

DEFENDANTS' MOTION FOR JUDGMENT ON THE PLEADINGS

Pursuant to Rule 12(c) of the Federal Rules of Civil Procedure, Defendants BP p.l.c., BP America Inc., BP Exploration & Production Inc., Anthony B. Hayward, Douglas Suttles, H. Lamar McKay, Robert W. Dudley, and Robert Malone (collectively, "Defendants") respectfully move for judgment on the pleadings in the above-captioned actions.

Defendants move for judgment on the pleadings on the ground that all Exchange Act claims in the pending individual actions based on alleged misstatements more than five years before the filing of the actions are time-barred under the Exchange Act's five-year statute of repose in 28 U.S.C. § 1658(b)(2).

The grounds for this motion are fully set forth in Defendants' Memorandum of Law in Support of Their Motion for Judgment on the Pleadings, filed concurrently herewith.

Dated: February 16, 2018

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing motion has been served by electronic CM/ECF filing, on this 16th day of February, 2018.

/s/ Thomas W. Taylor

Thomas W. Taylor